

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

United States of America,

Plaintiff,

-vs-

Mia Teanna Gutierrez,

Defendant.

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Case No. 1:20-cr-068

**MOTION FOR RELEASE
ON CONDITIONS**

The Defendant, Mia Teanna Gutierrez, through her attorney, Kent M. Morrow, hereby moves the Court for an order releasing her from pretrial detention on certain conditions. The substance of Gutierrez's motion is further set forth below.

The Court remanded her to federal custody on August 21, 2020 and detained her pending trial. She was brought to the Burleigh County Detention Center for her detention hearing in federal court and then transported to the Prairie Recovery Center, where she is currently awaiting trial.

Gutierrez has been approved for placement at Hope Manor, in Bismarck, ND. Gutierrez would be living in a sober living environment, with random drug and alcohol testing and attendance at 12-step groups. Defense counsel has significant experience working with Hope Manor and can assure the Court that Hope Manor will notify the probation office and her attorney if Gutierrez is having problems at Hope Manor. In fact, Hope Manor prefers that Bond Order/Orders for Release indicate that Gutierrez is to reside at Hope Manor and that Hope Manor is to notify the probation office if Mia is not complying with the requirements of living at Hope Manor.

Gutierrez would request that the jail release her to a family member or Hope Manor representative for transportation to Hope Manor.

The Court has the authority to order Gutierrez's release from pretrial detention upon certain conditions. 18 U.S.C. § 3142(c).

Based on the foregoing, Ms. Gutierrez respectfully requests that she be released, from incarceration, to reside at Hope Manor.

Dated this 23rd day of September, 2020.

/s/ Kent M. Morrow
Kent M. Morrow, #03503
Attorney for Defendant
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-vs-

CERTIFICATE OF SERVICE

Mia Teanna Gutierrez,

Defendant.

A true and correct copy of the ***MOTION FOR RELEASE ON CONDITIONS***, was on
this 23rd day of September, 2020, served by electronic mail upon the following:

rick.volk@usdoj.gov

/s/ Kent M. Morrow

Kent M. Morrow, #03503
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